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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

| | | |
|---------------------------|---|----------------------------------|
| UNITED STATES OF AMERICA, |) | No. 3:16-cr-00004-TMB-KFM |
| |) | |
| Plaintiff, |) | <u>COUNT 1:</u> |
| |) | POSSESSION OF CONTROLLED |
| vs. |) | SUBSTANCES WITH INTENT TO |
| |) | DISTRIBUTE |
| TERRY LEE KEEHN, II, |) | Vio. of 21 U.S.C. §§ 841(a)(1), |
| |) | (b)(1)(A) and (C) |
| Defendant. |) | |
| |) | <u>COUNT 2:</u> |
| |) | SEX TRAFFICKING AND |
| |) | ATTEMPTED SEX TRAFFICKING |
| |) | BY FORCE, FRAUD, AND |
| |) | COERCION |
| |) | Vio. 18 U.S.C. §§ 1591(a)(1) and |
| |) | 1594(a) |
| |) | |
| |) | <u>COUNT 3, 5:</u> |
| |) | SEX TRAFFICKING BY FORCE, |
| |) | FRAUD, AND COERCION |
| |) | Vio. 18 U.S.C. § 1591(a)(1) |
| |) | |

) COUNT 4, 6:
) PARTICIPATING IN A SEX
) TRAFFICKING VENTURE
) Vio. 18 U.S.C. § 1591(a)(2)
)

S E C O N D S U P E R S E D I N G I N D I C T M E N T

The Grand Jury charges that:

COUNT 1:

Possession of Controlled Substances with Intent to Distribute

On or about January 13, 2016, within the District of Alaska, the defendant, TERRY LEE KEEHN, II, did knowingly and intentionally possess with intent to distribute controlled substances, to wit: 50 grams or more of actual methamphetamine and a mixture and substance containing a detectable amount of heroin.

All of which is in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and (C).

COUNT 2:

Sex Trafficking and Attempted Sex Trafficking by Force, Fraud, and Coercion

Between on or about December 1, 2015, and a date no later than January 13, 2016, in the District of Alaska, the defendant, TERRY LEE KEEHN, II, in and affecting interstate commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, and maintain by any means, and did knowingly attempt to recruit, entice, harbor, transport, provide, obtain, advertise, and maintain by any means, a person, to wit: "B.H.," knowing, and in reckless disregard of the fact that means of force, threats of force, fraud,

coercion, and any combination of such means, would be used to cause the person to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and 1594(a).

COUNT 3:
Sex Trafficking by Force, Fraud, and Coercion

Between on or about October 1, 2015, and a date no later than January 13, 2016, in the District of Alaska, the defendant, TERRY LEE KEEHN, II, in and affecting interstate commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, and maintain by any means, a person, to wit: “R.N.” knowing, and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause the person to engage in a commercial sex act.

All in violation of Title 18, United States Code, Section 1591(a)(1).

COUNT 4:
Participating in a Sex Trafficking Venture

Between on or about October 1, 2015, and a date no later than January 13, 2016, in the District of Alaska, the defendant, TERRY LEE KEEHN, II, in and affecting interstate commerce, did knowingly benefit, financially and by receiving anything of value, from participation in a venture which has, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, and maintained by any means, a

person, to wit: “R.N.” knowing, and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause the person to engage in a commercial sex act.

All in violation of Title 18, United States Code, Section 1591(a)(2).

COUNT 5:
Sex Trafficking by Force, Fraud, and Coercion

Between on or about November 1, 2015, and a date no later than January 13, 2016, in the District of Alaska, the defendant, TERRY LEE KEEHN, II, in and affecting interstate commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, and maintain by any means, a person, to wit: “A.H.” knowing, and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause the person to engage in a commercial sex act.

All in violation of Title 18, United States Code, Section 1591(a)(1).

COUNT 6:
Participating in a Sex Trafficking Venture

Between on or about November 1, 2015, and a date no later than January 13, 2016, in the District of Alaska, the defendant, TERRY LEE KEEHN, II, in and affecting interstate commerce, did knowingly benefit, financially and by receiving anything of value, from participation in a venture which has, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, and maintained by any means, a

person, to wit: "A.H." knowing, and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause the person to engage in a commercial sex act.

All in violation of Title 18, United States Code, Section 1591(a)(2).

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Kyle Reardon
KYLE REARDON
United States of America
Assistant U.S. Attorney

s/ Kevin Feldis for
KAREN L. LOEFFLER
United States of America
United States Attorney

DATE: 5-19-16